

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

In the Matter of the True-Up of Union)	
Electric Company d/b/a Ameren Missouri's)	<u>File No. EO-2022-0027</u>
Fuel Adjustment Clause for the 34 th)	
Recovery Period)	
)	
In the Matter of the Adjustment of Union)	
Electric Company d/b/a Ameren Missouri's)	<u>File No. ER-2022-0026</u>
Fuel Adjustment Clause for the 37 th)	Tracking No. YE-2022-0025
Accumulation Period)	

**MOTION FOR ONE WEEK EXTENSION TO
FILE STAFF'S RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through Staff Counsel Office, and requests a continuance of one week to Friday, September 3, 2021, to file Staff's Recommendation, for the reasons identified below.

Background

1. On July 30, 2021, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed a revised tariff sheet proposed a revised fuel adjustment rate (FAR), bearing an effective date of October 1, 2021. On the same day, Ameren Missouri initiated a rate adjustment mechanism true-up to be included in the FAR. The fuel adjustment clause (FAC) tariff filing includes costs from the four-month period of February through May 2021. The filing includes costs from the February 2021 cold weather event, Winter Storm Uri.

2. The filings address previously unknown costs related to a research and development project involving a Bitcoin mining operation.

3. On August 6, 2021, Ameren Missouri filed a separate request, in EU-2022-0030, under Section 393.140 and 20 CSR 4240-2.060 requesting permission

to record the cost of impact the Bitcoin mining research and development project to a regulatory liability.

4. Under 20 CSR 4240-20.090(8)(H), the Commission must issue an order in the adjustment mechanism proceedings within 60 days of the filing. In this case, that deadline is September 28, 2021. Accordingly, the Commission ordered Staff recommendations reporting Staff's examination and analysis of Ameren Missouri's application and tariff sheet in these cases on August 27. Responses were ordered no later than September 8, 2021.

Request for Extension

5. Because Ameren Missouri's filings raised the novel issue of the Bitcoin mining research and development project, Staff's investigation in this case has had to focus on issues not raised in previous fuel adjustment clause proceedings.

6. Staff and Ameren Missouri have been in extensive discussions regarding the proper treatment of the Bitcoin mining research and development project as it relates to these fuel adjustment mechanism filings and the regulatory liability filing in EU-2022-0030.

7. Based on these discussions and the existence of a separate case raising identical issues, Staff requires an extension of one week to prepare its examination and analysis. As a result, Staff requests its recommendations be due Friday, September 3, 2021, with responses by September 10, 2021 or as soon thereafter as the Commission requires a response to prepare an order by the 60-day deadline of Tuesday, September 28, 2021.

8. Staff has discussed this request with Ameren Missouri, and Ameren Missouri does not object.

WHEREFORE, Staff respectfully requests a one-week extension to file its Recommendation in these cases to September 3, 2021, with responses by September 10, 2021 or as soon thereafter as the Commission requires a response to prepare an order by the 60-day deadline of Tuesday, September 28, 2021, and for such other and further relief as the Commission deems just.

Respectfully submitted,

/s/ Curt Stokes

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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 27th day of July, 2021, to all parties and/or counsels of record.

/s/ Curt Stokes