

**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	)	<b><u>File No. ET-2018-0063</u></b>
Approval of 2017 Green Tariff	)	Tracking No. YE-2018-0064

**JOINT MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATIONS**

**COME NOW** Staff of the Missouri Public Service Commission (Staff) and Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company)(collectively, "Movants"), and hereby request that the Commission grant the Staff and interested parties an extension of time to February 5, 2018, to file recommendations or a stipulation and agreement 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. Since the Company filed its application and tariff, the Staff and Ameren Missouri have held several productive technical discussions and engaged in discovery to answer questions and issues raised by the application. Most recently, the Staff, Ameren Missouri, and Office of Public Counsel (OPC) held a technical discussion on January 3, 2018 to exchange information and to address the status of discovery.

3. As a result of the January 3<sup>rd</sup> technical discussion, the Staff, Ameren Missouri, and OPC agreed that more time is needed to complete discovery and to engage in additional discussions prior to the Staff and interested parties filing recommendations. Based on the progress of current discussions, the Staff and Ameren Missouri believe it possible that a stipulation and agreement may be filed in lieu of recommendations. Accordingly the Staff and Ameren Missouri agreed to request an extension of time to February 5, 2018 for the filing of recommendations or a stipulation and agreement. As well, Ameren Missouri will extend the effective date of its tariff an additional 30 days from January 25, 2018 to February 24, 2018.

4. Public Counsel has authorized Movants to represent that it does not oppose this motion for an extension of time. Counsel for intervenors have been contacted and all have indicated that they do not oppose this Joint Motion for Extension of Time to File Recommendations.

**WHEREFORE**, Movants pray the Commission grant the Staff and interested intervenors an extension of time to file recommendations no later than February 5, 2018.

Respectfully submitted,

**/s/ Robert S. Berlin**

Robert S. Berlin  
Deputy Staff Counsel  
Missouri Bar No. 51709  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-7779 (Telephone)  
(573) 751-9285 (Fax)  
[bob.berlin@psc.mo.gov](mailto:bob.berlin@psc.mo.gov)

**Attorney for the Staff of the  
Missouri Public Service Commission**

**/s/ James B. Lowery**

James B. Lowery, #40503  
SMITH LEWIS, LLP  
P.O. Box 918  
Columbia, Missouri 65205  
(573) 443-3141 (T)  
(573) 443-3141 (F)  
[lowery@smithlewis.com](mailto:lowery@smithlewis.com)

**/s/ Wendy K. Tatro**

Wendy K. Tatro, # 60261  
Dir. and Asst. General Counsel

**/s/ Paula N. Johnson**

Paula N. Johnson, #68963  
Sr. Corporate Counsel

1901 Chouteau Avenue, MC 1310  
P.O. Box 66149  
St. Louis, MO 63166-6149  
(314) 554-4673 (phone)  
(314) 554-4014 (facsimile)  
[amerenmoservice@ameren.com](mailto:amerenmoservice@ameren.com)

**Attorneys for Union Electric Company d/b/a  
Ameren Missouri**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served electronically on this 4<sup>th</sup> day of January, 2018 to 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.

**/s/ Robert S. Berlin**