

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

In the Matter of Union Electric Company                     )  
d/b/a Ameren Missouri’s Request for                     ) **File No. EE-2024-0037**  
Variance Regarding Its Renewable Energy             )  
Standard Compliance   )

**MOTION FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Extension* respectfully states as follows:

1. On August 16, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its *Request for Variance and Waiver of 60-Day Notice Requirement* (“Application”).

2. Ameren Missouri’s Application requested a variance from Commission Rule 20 CSR 4240-20.100(3)(J), which requires Ameren Missouri to retire 90% of the Renewable Energy Credits (“REC”) needed to comply with the Renewable Energy Standard (“RES”) requirements during compliance year 2023, and limits Ameren Missouri to retiring no more than 10% of the required RECs in 2024.

3. Ameren Missouri’s REC bank, which it has used in the past to meet RES requirements, is currently depleted to the point that Ameren Missouri is relying on RECs generated during the 2023 compliance year, which while permitted under Commission regulations, brings into play certain practical impediments. Ameren Missouri’s Application stems from the delay between when RECs are generated, and when the RECs are verified and become available in the North American Renewable Registry (“NARR”) system for retirement.

4. Ameren Missouri is also requesting a variance from the 60-day notice requirement outlined under Commission Rule 20 CSR 4240-4.017(1).

5. The Commission ordered Staff to file its recommendation regarding this matter by September 18, 2023.

6. Staff issued a number of data requests (“DRs”) in this case on September 8, 2023, with responses from Ameren Missouri due by September 27, 2023.

7. In order to provide Ameren Missouri the necessary time to respond to Staff’s DRs, for Staff to analyze those responses and send any additional DRs, and for Staff to have the necessary time to draft its recommendation, Staff respectfully requests an extension through October 16, 2023 to file its recommendation in this matter.

**WHEREFORE**, Staff respectfully requests an extension until October 16, 2023 to file its recommendation in this matter.

Respectfully submitted,

**/s/ Travis J. Pringle**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, either electronically, by hand delivery, or by First Class United States Mail, postage prepaid, on this 13th day of September, 2023, to all counsel and/or 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/ Travis J. Pringle**