

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

In the Matter of the Adjustment of Union)	
Electric Company d/b/a Ameren Missouri's)	<u>File No. ER-2024-0112</u>
RESRAM Rate for the Fifth Accumulation)	Tariff No. JE-2024-0041
Period)	

MOTION FOR EXTENSION

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

1. On September 28, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) submitted a proposed rate schedule to adjust charges related to its Renewable Energy Standard Rate Adjustment Mechanism (RESRAM), supporting testimony and filed revised tariff sheets with an effective date of February 1, 2024.
2. On September 29, 2023, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, and Directing Staff Recommendation* ordering Staff to file a recommendation regarding its examination and analysis of Ameren Missouri proposed rate schedule.
3. Due to the failure of Ameren Missouri to respond to Staff’s Data Request, which was due November 20, 2023, and the need for Staff to properly analyze the information contained in the Data Request once it is received, Staff respectfully requests an extension to file its Recommendation concerning Ameren Missouri’s proposed rate schedule to December 19, 2023.

WHEREFORE, Staff prays that the Commission will grant this *Motion for Extension*, and order Staff to file its Recommendation no later than December 19, 2023,

and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Ron Irving

Ron Irving
Senior Counsel
Missouri Bar No. 56147
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-526-4612(Voice)
ron.irving@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record on this 22nd day of November, 2023.

/s/ Ron Irving