

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

In the Matter of Ameren Missouri’s 2023)
Utility Resource Filing pursuant to 20 CSR) File No. EO-2024-0020
4240 – Chapter 22)

**AMEREN MISSOURI’S UNOPPOSED MOTION FOR
EXTENSION OF TIME AND REQUEST FOR VARIANCE**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), and pursuant to 20 CSR 4240-22.080(15), hereby submits to the Missouri Public Service Commission ("Commission") its Motion for Extension of Time and Request for Variance to submit a joint filing and a reply to comments submitted by the stakeholders in this proceeding. In support of its motion, Ameren Missouri states as follows:

1. On September 26, 2023, Ameren Missouri submitted its 2023 triennial integrated resource planning ("IRP") compliance filing.
2. On February 27 and 28, 2024, the Commission's Staff ("Staff") filed its report and intervening stakeholders (the "Intervenors") filed comments in response to Ameren Missouri's IRP expressing concerns and asserting certain alleged deficiencies¹.
3. 20 CSR 4240-22.080(9) provides that if Staff, the Office of the Public Counsel, or any intervenor claims there are deficiencies in or concerns with the filed IRP, they will work with the utility and other parties to reach a joint agreement to submit to the Commission within 60 days of comments. 20 CSR 4240-22.080(9) further provides that if full agreement cannot be reached, this should be reported to the Commission through a joint filing no later than sixty (60) days after the date on which the report or comments were submitted. 20 CSR 4240-22.080(10) provides that if full agreement on remedying any deficiencies or concerns is not reached, the utility and other

¹ The Office of Public Counsel did not file comments.

stakeholders will have the opportunity to file comments in response to the other stakeholders within 60 days. The 60th day for joint comments and/or a response is April 28, 2024.

4. One of Ameren Missouri's employees, who plays a critical role in developing Ameren's IRP and resolving concerns and alleged deficiencies from Staff and the Intervenors, will be in Turkey during the second and third weeks of April. Other key Ameren Missouri employees are currently and will continue to prepare for hearing in Case No. EF-2024-0021 regarding the securitization of the Rush Island plant, which is scheduled for evidentiary hearing from April 15th through April 19th. For these reasons, Ameren Missouri does not expect it will be able to make significant progress in negotiating resolutions with Staff and the Intervenors until after April 19th.

5. Ameren Missouri therefore requests a thirty-day extension, up to and including May 28, 2024, to submit a joint agreement(s) and any response(s) necessary in this proceeding. Ameren Missouri also requests that all time periods contained in 20 CSR 4240-22.080 that are tied to the comment date should receive a commensurate thirty-day extension. Ameren Missouri seeks this additional time to negotiate with Staff and the Intervenors and reach agreement on as many alleged deficiencies and concerns as possible and reduce the number of issues on which agreement cannot be reached. Ameren Missouri does not seek to unduly delay this matter.

6. Ameren Missouri has contacted Staff and the Intervenors which submitted comments in this matter². Staff and the Intervenors which have filed comments have indicated they do not oppose this extension, understanding the additional time will be used productively.

WHEREFORE, Ameren Missouri requests a variance that would extend the 60-day time period for a joint filing pursuant to 20 CSR 4240-22.080(9) and for responses pursuant to 20 CSR

² These Intervenors include: Natural Resources Defense Council, Grain Belt Express, LLC, Sierra Club, Homes for All St. Louis, Council for New Energy Economics, Renew Missouri Advocates, and the Missouri and St. Louis National Association for the Advancement of Colored People.

4240-22.080(10) to 90 days, up to and including May 28, 2024. Ameren Missouri further requests that all time periods contemplated by 20 CSR 4240-22.080 that are tied to the comment date likewise be extended by thirty days.

Respectfully submitted,

/s/ William D. Holthaus, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon the parties listed on the official service list by e-mail on this 1st day of April, 2024.

/s/ William D. Holthaus, Jr.
William D. Holthaus, Jr.