

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

In the Matter of the Petition of Union)
Electric Company d/b/a Ameren Missouri)
For a Financing Order Authorizing the) **File No. EF-2024-0021**
Issue of Securitized Utility Tariff Bonds for)
Energy Transition Costs related to Rush)
Island Energy Center)

**STAFF NOTICE OF LATE FILING PROPOSED
FINANCING ORDER AND MOTION FOR EXTENSION**

COMES NOW Staff of the Missouri Public Service Commission and for this *Notice of Late Filing Proposed Financing Order and Motion for Extension* (“Motion”) respectfully states as follows:

1. Pursuant to the Commission’s *Amended Order Establishing Procedural Schedule* in this proceeding, Staff’s Proposed Financing Order is currently scheduled to be filed April 4, 2024. However, Staff is simply unable to file a proposed financing order on April 4, 2024. Staff only recently became aware that the person upon whom Staff was relying to draft the proposed financing order experienced a medical emergency and will be off work for some time, which will necessitate an entirely different person completely drafting the proposed financing order. Further exacerbating the problem, Staff Counsel’s Office has recently undergone multiple staffing/personnel changes which have resulted in changes to case staffing assignments, including assignments to this case.

2. At this time, Staff hopes to be able to file the proposed financing order no later than April 11, 2024, and accordingly requests that the Commission issue an order granting a filing extension until April 11, 2024. Staff does not make this request lightly or for the purpose of simple delay, but under the somewhat extraordinary circumstances

present believes such extension to be necessary. In the unlikely event Staff is able to file the proposed financing order earlier, Staff will do so.

3. Staff further respectfully submits that granting this requested extension will cause no harm. The schedule makes no provision for other parties to file responses to Staff's proposed financing order, and the Commission will still receive it long before the Commission must issue an actual financing order, *i.e.*, when a proposed order might become useful.

WHEREFORE Staff hereby notifies the Commission that for the reasons above it will be unable to file a proposed financing order by April 4, 2024, and respectfully requests the Commission issue an order granting Staff until April 11, 2024, to file same and for such other and further orders as may be just and reasonable.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 3rd day of April 2024.

/s/ Jeffrey A. Keevil