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

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In the Matter of Ameren Missouri's 2023 Utility Resource Filing pursuant to 20 CSR 4240 – Chapter 22

File No. EO-2024-0020

## AMEREN MISSOURI'S MOTION FOR SECOND 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 Second 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 deficiencies<sup>1</sup>.

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

<sup>&</sup>lt;sup>1</sup> 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 was April 28, 2024.

4. On April 12, 2024, the Commission extended the deadline to file joint comments and/or a response until May 28, 2024 on the grounds that certain key Ameren Missouri employees (as well as Commission Staff and other parties) were involved in another Commission hearing in File No. EF-2024-0021 regarding the securitization of the Rush Island plant (the "Securitization Case"). Additionally, another of Ameren Missouri's key employees was out of the country during the second and third weeks of April.

5. Since the conclusion of the Commission hearing in the Securitization Case on April 18th, Ameren Missouri has participated in no fewer than five conference calls with the seven Intervenors<sup>2</sup> that have submitted comments in response to Ameren Missouri's IRP. Additionally, Ameren Missouri has drafted joint resolutions, as well as descriptions of unresolved matters, to be incorporated into the joint filing of the parties that is currently due on May 28th. Ameren Missouri has circulated these drafts to the seven Intervenors and is currently responding to the numerous replies from the Intervenors.<sup>3</sup>

6. Ameren Missouri and the Intervenors have made significant progress in preparing a joint filing. Nonetheless, some outstanding issues remain that necessitate continued discussions between Ameren Missouri and the Intervenors.

7. Ameren therefore requests a two-week extension, up to and including June 11, 2024, to submit a joint agreement(s) and certain response(s) that will be necessary in this

<sup>&</sup>lt;sup>2</sup> 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.

<sup>&</sup>lt;sup>3</sup> In its report filed on February 28th, Staff expressed only a small number of concerns and no alleged deficiencies. Accordingly, the chief reason for this Motion is the Intervenors' alleged deficiencies and resolution of same.

proceeding. As before, 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 two-week extension.

8. Ameren Missouri seeks this additional time to negotiate with 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.

WHEREFORE, Ameren Missouri requests a variance that would extend by two weeks the current May 28th deadline to submit a joint filing pursuant to 20 CSR 4240-22.080(9) and for responses pursuant to 20 CSR 4240-22.080(10), up to and including June 11, 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 two weeks.

Respectfully submitted,

<u>/s/ William D. Holthaus, Jr.</u> William D. Holthaus, Jr., #63888 Corporate Counsel Wendy K. Tatro, #60261 Director & Assistant General Counsel Ameren Missouri 1901 Chouteau Avenue, MC 1310 St. Louis, MO 63103 (314) 554-3533 (phone) (314) 554-4014 (fax) AmerenMOService@ameren.com

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## <u>Attorneys for Union Electric Company</u> <u>d/b/a Ameren Missouri</u>

## **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 22nd day of May, 2024.

/s/ William D. Holthaus, Jr.

William D. Holthaus, Jr.