

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 Intervenors² 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.³

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

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.

³ 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,

/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 22nd day of May, 2024.

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