

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri’s Electric Tariffs)	<u>File No. ER-2025-0168</u>
Adjustment Relating to MEEIA EEIC Rider)	Tariff No. JE-2025-0080

**MOTION FOR VARIANCE AND EXTENSION OF
TIME TO FILE STAFF RECOMMENDATION**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Variance and Extension of Time to File Staff Recommendation*, states as follows:

1. On November 27, 2024, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a tariff sheet, with supporting testimony, to adjust the rate of its Missouri Energy Efficiency Investment Act (“MEEIA”) Energy Efficiency Investment Charge (“EEIC”). The tariff sheet bears an effective date of February 1, 2025.
2. On December 2, 2024, the Commission ordered Staff to provide a recommendation on the adjustments proposed by Ameren Missouri no later than December 27, 2024.
3. Staff requests additional time to review the proposed adjustments and supporting documentation provided by Ameren Missouri. The time required by the current schedule for all matters pending before the Commission is the reason for the request. To allow for this additional time for review, Staff requests a variance under Commission Rule 20 CSR 4240-20.093(14) to allow Staff to provide a recommendation beyond the 30-day timeframe outlined under Commission Rule 20-CSR 4240-20.093(4)(B).

4. Staff believes it will be able to file a recommendation by January 17, 2025, which will allow enough time for the Commission to remain within the 60-day time frame under 20 CSR 4240-20.093(4)(B). The Commission may also expedite approval and implementation of the proposed adjustments as it sees fit under Commission Rule 20 CSR 4240-2.080(14).

5. Additionally, this extension will not necessitate a delay of the February 1, 2025, effective date requested by Ameren Missouri. The Commission calendar allows two opportunities for Agenda between the requested Staff filing due date of January 17, 2024, and the effective date requested by Ameren Missouri.

6. Staff will endeavor to file its recommendation earlier, if possible. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully submits this *Motion for Variance and Extension of Time to File Staff Recommendation* for the Commission's information and consideration and prays the Commission grant Staff the requested variance and additional time within which to file its recommendation in this matter, on or before January 17, 2025; and to grant such other and further relief as the Commission considers just and reasonable in the circumstance.

Respectfully submitted,

/s/ Tracy D. Johnson

Tracy D. Johnson
Senior Staff Counsel
Missouri Bar No. 65991
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 526-5343
tracy.johnson@psc.mo.gov

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to the parties of record as listed in the Service List maintained for this case by the Commission's Data Center, on this 24th day of December, 2024.

/s/ Tracy D. Johnson