# DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Union	)
Electric Company d/b/a Ameren Missouri for an	) File No. EF-2025-0135
Order Authorizing the Issue and Sale of	)
Additional Long-Term Indebtedness	)

# STAFF REQUEST FOR AN EXTENSION OF TIME

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and pursuant to the January 13, 2025, *Order Directing Staff to File Recommendation*, states as follows:

- 1. On January 10, 2025, the Union Electric Company d/b/a Ameren Missouri ("Ameren" or "Applicant") filed its *Motion for Expedited Treatment and Application for Financing Authority* (Application).
  - 2. Ameren requested that the Commission:
    - a. Approve Ameren's application authorizing its financing request to issue and sell up to \$500,000,000 aggregate principal amount of additional long-term indebtedness.
    - b. Approve its request expeditiously, by February 27, 2025, so that it may conduct its requested financing(s) on and after March 9, 2025.<sup>1</sup>
- 3. On January 13, 2025, the Commission ordered Staff to file its *Recommendation* or a request for an extension of time no later than January 27, 2025.
  - 4. On January 14, 2025, Staff sent data requests to the Applicant. Responses

<sup>&</sup>lt;sup>1</sup> 20 CSR 4240-2.080(14) requires requests for expedited treatment to include 'Motion for Expedited Treatment" in the title of the pleading.

<sup>20</sup> CSR 4240-2.080(14)(A)–(C) requires the Applicant to include the Commission's requested date to act, the arm avoided, the benefit accrued, or the absence of negative effects on customers or the general public, along with the justification of its claims. The pleading must also state that it was filed as soon as possible, with an explanation if it was not.

are due to Staff by February 3, 2025.<sup>2</sup> Depending upon Ameren's responses, Staff may need more time to conduct discovery before offering its recommendation to the Commission.

5. Staff requests that the Commission extend the deadline for its recommendation to February 14, 2025. Staff will proceed as quickly as possible, subject to Ameren's speed and responsiveness to its information requests.

**WHEREFORE**, Staff respectfully requests that the Commission accepts its *request* for an extension of time and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

### /s/ Eric Vandergriff

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# **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 27<sup>th</sup> day of January, 2025.

#### /s/ Eric Vandergriff

<sup>2</sup> Ameren responded to three of Staff's seven request on January 22, 2025, ahead of the discovery deadline.