# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company, d/b/a Ameren Missouri's 2015 RES Compliance Report and 2016-2018 Compliance Plan

File No. EO-2016-0286

## SECOND MOTION FOR EXTENSION OF TIME TO JUNE 24, 2016 FOR STAFF TO FILE ITS REPORT ON AMEREN MISSOURI'S <u>CALENDAR YEAR 2015 RES COMPLIANCE REPORT</u>

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its second motion for an extension of time for Staff to file its *Staff Report On Ameren Missouri's Calendar Year 2015 RES Compliance Report* to the Missouri Public Service Commission (Commission), states as follows:

1. On May 31, 2016, the Commission granted Staff's first motion for extension of time to file its *Staff Report On Ameren Missouri's Calendar Year 2015 RES Compliance Report* until June 10, 2016. That motion was unopposed.

2. Staff has had productive meetings with company staff in an effort to resolve certain questions and concerns regarding Ameren Missouri's 2015 RES Compliance Report. However, more time is needed for the company and Staff to reach a final resolution of Staff's concerns regarding compliance reporting for 2015. As a result of Staff's discussions with Ameren Missouri, Staff anticipates that the Company will make a supplemental filing regarding its 2015 RES Compliance Report further necessitating an extension of time to June 24, 2016 for Staff to finalize and file its report. Staff will file its report earlier than June 24<sup>th</sup> if possible.

3. With this request interveners should also be allowed an extension of time to June 24th to file their comments. Staff has discussed this motion with Ameren

Missouri counsel and is authorized to represent that Ameren Missouri supports this motion. No party would be prejudiced by the requested extension of time to file comments on Ameren Missouri's 2015 RES Compliance Report.

4. Staff notes the Commission has granted intervention in this matter to Missouri Department of Economic Development – Division of Energy, Earth Island Institute d/b/a Renew Missouri, United for Missouri, Inc. and the Missouri Industrial Energy Consumers. Staff has circulated its request to counsel for the above interveners and Office of Public Counsel and is not aware of any objection to it.

WHEREFORE, the Staff moves the Commission grant its request for a second extension of time to June 24, 2016 for it to submit its report and for interveners to file comments regarding Ameren Missouri's 2015 RES Compliance Report.

Respectfully submitted,

### <u>/s/ Robert S. Berlin</u>

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### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9<sup>th</sup> day of June, 2016, to all counsel of record.

### <u>/s/ Robert S. Berlin</u>