BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of an Investigation of the Cost to)	
Missouri's Electric Utilities Resulting from)	File No. EW-2012-0065
Compliance with Federal Environmental Regulations)	

MOTION OF SIERRA CLUB FOR EXTENSION OF TIME TO RESPOND TO COMMENTS

Comes now the Sierra Club and for its motion states:

- 1. On July 30, 2014, the Commission entered an order asking stakeholders to address a number of questions concerning compliance with the Environmental Protection Agency's recently published proposed state-specific rate-based goals for carbon dioxide emissions for existing fossil fuel-fired electric generating units (the "Clean Power Plan"). The order asked participants to address the questions in their August 18 workshop presentations and invited comments to be filed by August 25.
- 2. On August 6, 2014, the Commission entered an order asking stakeholders to address additional questions concerning Building Block 3 in the Clean Power Plan, along with a clarification to Question V e in the Commission's July 30 order. The order asked participants to address the questions in their August 18 presentations and invited comments to be filed by August 25.
- 3. On August 22, the Commission entered an order granting the parties until September 2 to file responses to one another's comments.
- 4. On August 25 and 26, seven stakeholders filed comments comprising hundreds of pages of nuanced and technical documentation.

5. The eight days allotted for response conclude on the day after the Labor

Day holiday weekend, making it difficult to meaningfully review and respond to the

thorough filings made on Monday, August 25 and Tuesday, August 26.

6. Sierra Club has attempted to reach the other parties that filed on August 25

and August 26. Peabody Energy consents to this request; Ameren Missouri, KCP&L,

KCP&L-GMO, and AMEC have responded that they do not object. We have not heard

back from NRDC or Empire District.

7. WHEREFORE, Sierra Club respectfully requests the Public Service

Commission to grant all parties an additional seven (7) days, until September 9, 2014, to

reply to the comments filed on August 25 and August 26.

/s/ Henry B. Robertson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 28th day of August, 2014, to the parties on the Commission's service list.

/s/Henry B. Robertson

Henry B. Robertson

2