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

In the Matter of Union Electric Company d/b/a Ameren Missouri's Electrical Service Tariffs Adjustment Relating to MEEIA EEIC Rider ) Tracking No.: JE-2023-0097

File No. ER-2023-0178

### MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION

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

1. On December 1, 2022, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed a *Tariff Revision* bearing an issue date of December 1, 2022, and an effective date of February 1, 2023, along with the Direct Testimony of Antonio M Lozano with the Missouri Public Service Commission ("Commission") seeking to make revisions to its Energy Efficiency Investment Clause ("EEIC") Rider in its tariffs.

2. On December 5, 2022, the Commission issued an Order Directing Notice, Establishing Intervention Deadline, and Directing Filing of Staff Recommendation; in its Order, the Commission directed Staff to submit a recommendation regarding the Company's filing no later than January 4, 2023.

3. Staff seeks additional time to obtain critical information from Ameren Missouri prior to submitting its recommendation, specifically regarding kWh saved and Ameren's explanation of their rebase adjustment.

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4. In order to provide Staff sufficient time to obtain and analyze that information and data, Staff requests until January 13, 2023, within which to submit its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

5. 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 Extension of Time to File Staff Recommendation* for the Commission's information and consideration and hereby prays the Commission grant Staff until January 13, 2023, within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

#### <u>/s/ Carolyn H. Kerr</u>

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Attorney for Staff of the Missouri Public Service Commission

# 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 4<sup>th</sup> day of January, 2023, to all counsel of record.

# <u>/s/ Carolyn H. Kerr</u>