

**BEFORE 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 Authority to Sell or Transfer a Portion)
of Its Franchise, Works, or System to)
SSM HEALTH, INC. d/b/a SSM Health)
Saint Louis University Hospital.)

File No. EO-2019-0391

**AMEREN MISSOURI'S MOTION FOR A FURTHER EXTENSION OF TIME TO
AUGUST 13, 2019 FOR STAFF TO FILE ITS RECOMMENDATION**

Comes now Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company") and submits this *Motion for a Further Extension of Time to August 13, 2019 for Staff to File Its Recommendation ("Motion to Extend")*. In support of this *Motion to Extend*, Ameren Missouri states as follows:

1. On June 13, 2019, Ameren Missouri filed an *Application and Request for Waiver and Motion for Expedited Treatment ("Initial Application")*. In its *Initial Application*, the Company requested authority to sell, transfer, and otherwise dispose of a portion of its franchise, works, or system, namely a transformer, to SSM HEALTH, INC.d/b/a SSM Health Saint Louis University Hospital ("SSM Health"). On June 14, 2019, the Commission issued its *Order Providing Notice and Directing Staff Recommendation*, directing the Commission Staff ("Staff") to file a recommendation regarding Ameren Missouri's *Initial Application* by July 3, 2019. The order indicated that "[i]f Staff finds that it cannot reasonably file a recommendation by that date, it may file a request for additional time, indicating when it can file a recommendation."

2. On June 26, 2019, Staff filed its *Motion for Additional Time to July 23, 2019 to File Staff Recommendation*. In that motion, Staff stated that additional time was needed to receive

responses to data requests and complete Staff's recommendation. The Commission granted this motion in an order issued June 27, 2019.

3. During Staff's examination of the information provided, Staff noted that the sales price indicated in the *Initial Application* did not match the amount listed in the Bill of Sale attached as Appendix 4. Staff informed Ameren Missouri of this mismatch. Ameren Missouri noted that the income taxes had been inadvertently omitted, resulting in an incorrect sales price in paragraphs 9 and 10 of the body of the *Initial Application*. Shortly thereafter, on July 17, 2019, Ameren Missouri submitted its *Amended Application and Request for Waiver and Motion for Expedited Treatment* ("*Amended Application*") containing what it thought was the correct sales price listed in paragraphs 9 and 10. On July 22, 2019, Staff submitted its *Motion for a Further Extension of Time to August 2, 2019 to File Staff Recommendation*, requesting additional time to continue discussions regarding the Company's calculation of the income tax calculations. The Commission issued an order granting this request on July 22, 2019.

4. After discussions between Staff and Ameren Missouri, the Company determined Staff was correct: the income taxes have been miscalculated. Ameren Missouri has recalculated the correct income taxes to include in the sales price, and is preparing to file a *Second Amended Application and Request for Waiver and Motion for Expedited Treatment* ("*Second Amended Application*") to correct the error. This also requires the execution of a new Bill of Sale with SSM Health to include as a corrected Appendix 4. Once the Company has completed a redraft of the *Second Amended Application*, including the updated Appendix 4, it will submit it via EFIS and serve it upon Staff via email. Ameren Missouri hopes to complete this no later than August 1, 2019. In the interim, because of the Company's error and the need to have complete and correct

information for its examination, Staff understandably will not be able to complete its recommendation by August 2, 2019.

5. To allow Staff additional time to examine the forthcoming corrected *Second Amended Application* and associated updated data request responses, Ameren Missouri requests an additional extension for Staff to submit its recommendation – currently August 2, 2019 – to no later than August 13, 2019. The Company sincerely apologizes for its errors, which have delayed this process.

6. Ameren Missouri has authority to state that Staff does not oppose this motion.

WHEREFORE, for the reasons set forth above, Ameren Missouri respectfully requests that the Commission grant the requested extension and grant Staff until no later than August 13, 2019, to submit its recommendation.

Respectfully submitted,

By: /s/ Paula N. Johnson-----

Paula N. Johnson, #68963
Senior Corporate Counsel
Ameren Missouri
1901 Chouteau Ave.
P. O. Box 149 (MC 1310)
St. Louis, MO 63166
(314) 554-3533 (telephone)
(314) 554-4014 (facsimile)
AmerenMOService@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the parties and/or counsel of record this 31st day of July, 2019.

General Counsel's Office
Missouri Public Service Commission
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov

Office of the Public Counsel
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102-2230
opcservice@ded.mo.gov

/s/ Paula N. Johnson

Paula N. Johnson