

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

In the Matter of Ameren Missouri's)
2017 Utility Resource Filing Pursuant)
To 4 CSR 240 – Chapter 22)

File No. EO-2018-0038

STAFF MOTION FOR COMMISSION ORDER

COMES NOW the Staff of the Missouri Public Service Commission in response to Union Electric Company's d/b/a Ameren Missouri's September 25, 2017, Electric Utility Resource Planning Filing pursuant to 4 CSR 240 – Chapter 22. The Staff requests a Commission Order setting responsive filings to said filing for no later than February 26, 2018. In support thereof, the Staff states as follows:

1. On June 1, 2015, in File No. EE-2015-0316 Ameren Missouri filed a Request For Variance From 4 CSR 240-22.080(1)(C) to file its next Triennial Electric Utility Resource Planning Filing on October 1, 2017, instead of on April 1, 2017.

2. On July 22, 2015, the Commission issued an Order Granting Variance in which it granted Ameren Missouri's request for variance.

3. On August 1, 2017, in File No. EO-2018-0038, Ameren Missouri filed a Notice Of Case Filing in which, among other things, it stated in Paragraph 1, on page 1: "Ameren Missouri's triennial compliance filing is due October 1, 2017. Because October 1, 2017, is a Sunday, Ameren Missouri will make its filing on October 2, 2017."

4. On August 2, 2017, in File No. EE-2018-0040, Ameren Missouri filed Ameren Missouri's Request For Waivers And Request For Expedited Treatment in which, among other things, it stated in Paragraph 2, on page 1: "Consistent with the waiver granted by the Commission in File No. EE-2015-0316, Ameren Missouri will

submit its next comprehensive triennial Integrated Resource Plan (IRP) filing on September 29, 2017.”

6. 4 CSR 240-2.250 Computation of Time states, in part, as follows at subsection (1):

(1) In computing any period of time prescribed or allowed by the commission, the day of the act, event, or default shall not be included. The last day of the period so computed shall be included, unless it is a Saturday, Sunday, or legal holiday, in which case the period runs until the end of the next day which is not a Saturday, Sunday, or legal holiday. This rule does not apply when the commission establishes a specific date by which an action must occur, nor does it operate to extend effective dates which are established by statute. [Emphasis supplied.]

October 1, 2017, which has now passed, was a Sunday. As a consequence, pursuant to 4 CSR 240-2.250(1), September 29, 2017, was the correct end date for the filing of Ameren Missouri’s Triennial Electric Utility Resource Planning submission which Ameren Missouri filed on September 25, 2017.

5. Regarding the end date for parties filing a responsive report to Ameren Missouri’s September 25, 2017, triennial compliance filing, the Staff would note that 4 CSR 240-22.080 Filing Schedule, Filing Requirements, and Stakeholder Process states, in part, as follows at subsections (7) and (8):

(7) The staff shall conduct a limited review of each triennial compliance filing required by this rule and shall file a report not later than one hundred fifty (150) days after each utility’s scheduled triennial compliance filing date. . . .

* * * *

(8) Also within one hundred fifty (150) days after an electric utility’s triennial compliance filing pursuant to this rule, the public counsel and any intervenor may file a report or comments. . . .

7. It matters not that Ameren Missouri made its triennial compliance filing on September 25, 2017, because in the language of 4 CSR 240-22.080(7), the “utility’s

scheduled triennial compliance filing date” was September 29, 2017, and one hundred fifty (150) days after September 29, 2017 is Monday, February 26, 2018. The Staff, OPC, and intervenors are required to file their reports no later than February 26, 2018, which is one hundred fifty (150) days after September 29, 2017, Ameren Missouri’s scheduled triennial compliance filing date.

WHEREFORE, the Staff requests a Commission Order setting responsive filings to Ameren Missouri’s Triennial Electric Utility Resource Planning filing for no later than February 26, 2018, pursuant to prior Commission Orders respecting Ameren Missouri’s 2017, triennial compliance filing and the Commission Rules noted hereinabove.

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim, Mo. Bar #29149
Chief Deputy Staff Counsel
(573) 751-7489 (Telephone)
steve.dottheim@psc.mo.gov (E-mail)

Nathan Williams, Mo. Bar #35512
Deputy Staff Counsel
(573) 751-8702 (Telephone)
nathan.williams@psc.mo.gov (E-mail)

Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102
(573) 751-9285 (Fax)

**Attorneys for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 3rd day of October, 2017.

/s/ Steven Dottheim