

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

In the Matter of Union Electric Company,)
d/b/a Ameren Missouri’s 2015 RES Compliance) **File No. EO-2016-0286**
Report and 2016-2018 Compliance Plan)

**MOTION FOR EXTENSION OF TIME TO JUNE 10, 2016 FOR
STAFF TO FILE ITS REPORT ON AMEREN MISSOURI’S
CALENDAR YEAR 2015 RES COMPLIANCE REPORT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its 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 April 15, 2016, Union Electric Company d/b/a Ameren Missouri (Company) filed its 2015 Annual Renewable Energy Standard (RES) Compliance Report (2015 Compliance Report) for calendar year 2015 as required by rule.¹

2. Commission rule 4 CSR 240-20.100(8) states:

...Each electric utility shall file an RES compliance report no later than April 15 to report on the status of both its compliance with the RES [renewable energy standard] and its compliance plan as described in this section for the most recently completed calendar year...

3. Rule 4 CSR 240-20.100(8)(A) specifies what information the utility must provide in its annual RES Compliance Report.

4. Rule 4 CSR 240-20.100(8)(D) provides that:

The staff of the commission shall examine each electric utility’s annual RES compliance report and RES compliance plan and file a report of its review with the commission within forty-five (45) days of the filing of the annual RES

¹ That same day Ameren Missouri also filed its 2016 – 2018 RES Compliance Plan.

compliance report and RES compliance plan with the commission. The staff's report shall identify any deficiencies in the electric utility's compliance with the RES.

5. On April 16, 2016, the Commission issued its *Order Directing Notice And Setting Filing Date*, directing the Staff to file a report of its review of the Company's 2015 Compliance Report before May 30, 2016, forty-five (45) days from the Company's filing.

6. Staff is reviewing Ameren Missouri's 2015 RES Compliance Report and has requested the Company provide additional information for its review. The Company is in the process of providing the additional information to Staff so that it can complete its report. However, due to the unavailability of certain company staff and the need for additional time for Staff to review and discuss the additional information with the company, the Staff respectfully requests an additional period of time to review additional information and to file its report to the Commission regarding Ameren Missouri's 2015 RES Compliance Report. Therefore the Staff requests that the Commission grant it and the interveners in this docket to June 10, 2016 to file comments regarding Ameren Missouri's 2015 RES Compliance Report.²

7. 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.

² Staff is filing its report on Ameren Missouri's 2016-2018 RES Compliance Plan on May 27, 2016 (due May 30, 2016) in this docket. The requested extension of time to June 10, 2016 applies only to the deadline for Staff to file its report and interveners to file comments on the 2015 RES Compliance Report due May 30, 2016.

8. 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 it an extension of time from May 30, 2016 to June 10, 2016 for it to submit its report and for interveners to file comments regarding Ameren Missouri's 2015 RES Compliance Report.

Respectfully submitted,

/s/ Robert S. Berlin

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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 27th day of May, 2016, to all counsel of record.

/s/ Robert S. Berlin