

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

In the Matter of a Working Case to Draft a Rule to)
Modify Commission Rules Regarding Renewable) File No. EW-2014-0092
Energy Standard Requirements and Net Metering)
Standards)

MOTION TO EXTEND DEADLINE FOR FILING PROPOSED AMENDMENTS

COMES NOW Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), by and through the undersigned counsel, on behalf of the, the Missouri Solar Energy Industries Association (“MOSEIA”), Wind on the Wires, and Brightergy, LLC (referred to herein as “the Signatories”), and files this Motion to Extend Deadline for Filing Proposed Amendments. The following parties have indicated that they do not oppose the Motion: Staff of the Missouri Public Service Commission (“Staff”), the Missouri Division of Energy, Office of the Public Counsel (“OPC”), Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), Kansas City Power & Light Company (“KCP&L”), the Empire District Electric Company (“Empire”), and the Missouri Industrial Energy Consumers (“MIEC”). For its Motion, Renew Missouri states as follows:

1. On October 10, 2013, the Commission issued a Notice of this working case to facilitate Staff’s efforts to obtain input from interested stakeholders regarding the drafting of amendments to the Commission’s renewable energy standard and net metering rules due to the Section 393.1030, RSMo. statutory revisions in HB 142 passed by the General Assembly.

2. The Commission’s notice further directed Staff to conduct one or more workshops to obtain stakeholder input on the necessary revisions, with the time and location arranged by Staff.

3. On December 20, 2013, Staff filed a Notice of Workshops in this case, scheduling two in-person workshops for January 30, 2014 and March 11, 2014.

4. After submission of informal written comments and discussions on various key rulemaking issues at the January 30 and March 11 workshops, several parties suggested that additional time and an additional workshop may be necessary before Staff submits proposed amendments to the Commission's renewable energy standard and net metering rules.

5. Accordingly, Renew Missouri and the above-mentioned Signatories request that the Commission extend the deadline for Staff's submission of proposed amendments to the Commission to Thursday, May 15, 2014.

6. The purpose of this extension, if granted, is to allow Staff to schedule and hold an additional workshop, to gather additional input from stakeholders before Staff submits proposed amendments to the Commission.

WHEREFORE, Renew Missouri, on behalf of the above-mentioned Signatories, requests that the Commission extend the deadline for Staff's submission of proposed amendments to the Commission to Thursday, May 15, 2014.

Submitted by,

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this filing was sent by email to all parties of record in this case on March 13, 2014.

/s/ Andrew J. Linhares

Andrew J. Linhares