DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's 3rd Filing to)	
Implement Regulatory Changes in)	File No. EO-2018-0211
Furtherance of Energy Efficiency as)	
Allowed by MEEIA)	

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its *Motion for Extension* respectfully states as follows:

- 1. On July 2, 2021, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its *Application for Modification of Demand Side Management Plan, and Approval of Associated Variances* ("Application"), with supporting information and testimony, seeking approval of the modification of its Demand-Side Management Portfolio and Plan for years 2019-2021 in order to extend the plan's effective date through December 31, 2023.
- 2. The Commission issued its *Order Setting Time for Responses and Directing Staff Recommendation* on July 8, 2021, ordering Staff to file a recommendation regarding Ameren's Application or, in the alternative, a status report indicating when Staff will be able to file a recommendation.
- 3. On July 15, 2021, Staff filed a *Status Report* explaining that Staff and Ameren Missouri had been discussing the Application, but due to ongoing commitments in Ameren Missouri's ongoing electric and gas rate cases under File Nos. ER-2021-0240 and GR-2021-0241, Staff requested to file its recommendation no later than September 13, 2021.

4. On August 9, 2021, the Commission granted Staff's request in its Order Directing Staff Recommendation, setting the new response date for September 13, 2021.

5. Parties have continued discussions regarding the Application, and hope to file a stipulation in lieu of any recommendations. To further this end, Staff requests an

additional thirty days for parties to formalize and finalize a stipulation.

WHEREFORE, Staff files this *Motion for Extension*, and respectfully requests that the Commission issue an order setting October 13, 2021 as the filing date for any stipulation or recommendation in this matter.

Respectfully submitted,

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 13th day of September, 2021.

/s/ Nicole Mers