

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

In the Matter of a Working Case Regarding)
Amendments to the Commission's Ex Parte)
and Extra-Record Communications Rule)

Case No. AW-2016-0312

CONSUMERS' GROUP REQUEST FOR EXTENSION

COMES NOW, the Midwest Energy Consumers Group; the Missouri Industrial Electric Consumers; the Office of the Public Counsel; and the Consumers Council of Missouri (collectively, "the Consumers' Group") and for its Request for Extension respectfully request as follows:

1. On June 8, 2016, the Commission issued its *Order Opening a Working Case to Consider Changes to the Commission's Ex Parte and Extra-Record Communications Rule*. In that Order, the Commission established a deadline of July 8 for parties to respond to proposed revisions to its Ex Parte rule.

2. The Consumers' Group suggests that, given the number of other matters pending before the Commission, the July 8 filing date is extremely ambitious and effectively precludes the Consumers' Group entities from providing meaningful comments. Specifically, the Consumers' Group wishes to make the Commission aware of the following activities:

- a. Pending Empire rate proceeding (ER-2016-0023)
- b. Pending GMO rate proceeding (ER-2016-0156)
- c. Pending Missouri American rate proceeding (WR-2015-0301)
- d. Pending Laclede complaint proceeding (GC-2016-0297)
- e. MEEIA Rulemaking
- f. Fuel Adjustment Clause Rulemaking
- g. Legislative Workshop (EW-2016-0313)

- h. Upcoming Ameren rate case (ER-2016-0179)
- i. Upcoming KCPL rate case (ER-2016-0285)
- j. Electric Vehicle Charging Station workshop

3. Each of these cases involves one or more of the parties in the Consumers' Group. Involvement in these proceedings necessarily requires resources that preclude full involvement in other proceedings, such as the pending *ex parte* workshops.

4. The Consumers' Group would point out that many of these cases involve defined operation of law dates that prevent any extensions. In contrast, the pending *ex parte* docket is an entirely discretionary docket that can be completed after these mandatory cases. In fact, the Commission has operated under the *ex parte* rules for almost seven years. The Consumers' Group is unaware of any matters that mandate that the Commission address this matter during this period of heavy rate case filings.

5. Given the numerous other proceedings currently pending, the Consumers' Group suggests that the Commission extend the filing dates for the *ex parte* docket. Specifically, the Consumers' Group suggests that the Commission postpone these dates until the pending rate cases are completed, but, at a minimum, no less than 3 months.

WHEREFORE, the Consumers' Group respectfully requests that the Commission extend the date for filing comments in the above-captioned proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



David L. Woodsmall

Dated: June 24, 2016