

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

Doug Geno and	)	
Nancy Geno,	)	
Complainants,	)	
	)	
vs.	)	Case No. EC-2009-0400
	)	
Union Electric Company d/b/a	)	
AmerenUE,	)	
Respondent.	)	

**MOTION FOR EXTENSION OF TIME**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and submits its *Motion for Extension of Time* as follows:

1. On May 7, 2009, Doug and Nancy Geno (Complainants), filed a *Formal Complaint* with the Missouri Public Service Commission (Commission) seeking damages against Union Electric Company d/b/a AmerenUE (AmerenUE) for the cost of lost property.

2. On June 10, 2009 AmerenUE filed an *Answer* to the *Complaint* and simultaneously filed a *Motion to Dismiss* based on Complainants seeking relief outside the Commission's statutory authority.

3. On June 11, 2009, the Commission ordered Staff to file a recommendation by no later than June 26, 2009.

4. On June 22, 2009, Staff filed a *Motion for Extension* because safety concerns were brought to Staff's attention and further discovery deemed necessary. Staff has conducted an onsite visit of the Applicant's property and issued date request to AmenenUE to provide information requested. Staff agreed to an extension until July 20, 2009. On July 28, 2009

AmerenUE provided the requested information to Staff which is needed for Staff's Recommendation.

5. Staff still needs time to review it and determine whether to issue additional date requests therefore Staff believes the Commission will benefit, and no party will suffer harm, if the Commission extends to August 31, 2009, the date the Staff files its recommendation in this case.

**WHEREFORE**, because Staff is still gathering information and needs sufficient time to obtain and review that information, Staff moves that the Commission to grant Staff's recommendation deadline from July 31, 2009 to August 31, 2009.

Respectfully submitted,

/s/ Jaime N. Ott

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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 counsel of record this 28<sup>th</sup> day of July, 2009.

/s/ Jaime N. Ott