

**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. Because of factual allegations of improper grounding made in AmerenUE's pleading that raises safety concerns, Staff plans on conducting an onsite visit and issuing data request, which has not yet occurred, that is necessary to gather additional facts.

5. Staff will need sufficient time to obtain and review the facts from the onsite visit and to obtain and review data requests, in order to make a proper recommendation to the

Commission to act on the *Complaint*. Staff cannot reasonably to this and make a recommendation by June 26, 2009.

**WHEREFORE**, because Staff needs sufficient time to review the additional facts from the onsite visit, Staff moves that the Commission grant an extension of Staff's recommendation deadline from June 26, 2009 to July 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 22<sup>nd</sup> day of June, 2009.

/s/ Jaime N. Ott