

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

Vas Construction, LLC,	)	
	)	Consolidated
Complainant,	)	EC-2021-0295
	)	EC-2021-0296
vs.	)	EC-2021-0297
	)	EC-2021-0298
UNION ELECTRIC COMPANY	)	EC-2021-0299
d/b/a Ameren Missouri,	)	EC-2021-0300
	)	EC-2021-0301
Respondent.	)	EC-2021-0302
	)	EC-2021-0303

**MOTION FOR FURTHER EXTENSION OF TIME**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Motion for Extension of Time states:

**Procedural Background**

1. On March 19, 2021, Vas Construction, LLC ("Complainant") filed nine complaints with the Missouri Public Service Commission ("Commission") against Ameren Missouri (File Nos. EC-2021-0295, EC-2021-0296, EC-2021-0297, EC-2021-0298, EC-2021-0299, EC-2021-0300, EC-2021-0301, EC-2021-0302, EC-2021-0303). On April 7, 2021, the Commission granted the consolidation of the nine complaints filed by Complainant with the lead file number EC-2021-0295.

2. On March 22, 2021, the Commission issued its *Order Giving Notice and Directing Responses to Complaint*, which *inter alia* directed Ameren Missouri to file an answer to the Complaint no later than April 21, 2021.

3. On April 21, 2021, Ameren Missouri filed a Motion for Extension of Time, which was granted by the Commission.

4. The Commission directed Ameren Missouri to file its answer or notice that the complaint has been satisfied by May 7, 2021.

5. On May 14, 2021, Ameren Missouri filed a Motion for Further Extension of Time, and apologized for the delay in responding.

6. On May 14, 2021, the Commission granted the Company's request for further extension, and set the timeframe for response as no later than May 24, 2021.

**Motion**

7. Over the last several weeks, the Parties have been engaged in settlement negotiations, and have reached an agreement in principle. The Parties are close to finalizing the written settlement agreement. However, counsel for Complainant is out of town through the middle of next week. As a result, the Parties require additional time to finalize the settlement agreement. Therefore, the Company requests a further extension of time to respond.

8. The Parties believe that an additional eleven (11) days will allow sufficient time for the Company and Complainant to reduce the settlement agreement to writing.

**WHEREFORE**, Ameren Missouri respectfully requests that the Commission enter an order extending the Company's deadline to satisfy the Complaint, or answer the Complaint, to no later than June 4, 2021.

Respectfully submitted,

/s/ **Jermaine Grubbs**

Jermaine Grubbs, # 68970

Corporate Counsel

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**CERTIFICATE OF SERVICE**

I, Jermaine Grubbs, as counsel for Union Electric Company d/b/a Ameren Missouri, hereby certify that a copy of the foregoing Motion for Extension of Time was filed with the Missouri Public Service Commission via EFIS. Copies have also been served electronically to the below parties at their respective email addresses on this 19<sup>th</sup> day of May, 2021.

**Missouri Public Service Commission**

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