

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

John W. Williamson,)	
Complainant,)	
v.)	File No. EC-2021-0286
)	
Union Electric Company d/b/a Ameren Missouri,)	
Respondent)	

RESPONSE AND REQUEST FOR MEDIATION

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), pursuant to 20 CSR 4240-2.125(2)(A) and for its *Response and Request for Mediation* states as follows.

Procedural Background

1. On March 12, 2021, John W. Williamson ("Complainant") filed a small formal complaint with the Missouri Public Service Commission ("Commission") against Ameren Missouri.
2. On March 17, 2021, the Commission issued its Notice of Small Formal Complaint and Order Directing Staff to Investigate and File a Report which *inter alia* directed Ameren Missouri to file a Response to the Complaint no later than Friday, April 16, 2021.

Request for Mediation

3. 20 CSR 4240-2.125 is entitled "Procedures for Alternative Dispute Resolution." Per 20 CSR 4240-2.070(15)(A), the utility against whom the small formal complaint has been filed is allowed thirty (30) days after the date of notice to “satisfy the complaint or file an answer.”
4. 20 CSR 4240-2.125(2)(A) states the Commission "may order mediation before any further proceeding in a case."
5. 20 CSR 4240-2.125(2)(B) states when the Commission "deems it appropriate *or upon request for mediation* (Emphasis Supplied), the Commission may appoint a presiding officer or other neutral third party other than the presiding officer assigned to the case to mediate the dispute."

6. 20 CSR 4240-2.125(2)(C) dictates that once a request for mediation has been requested, "[a]ll other actions on the case shall cease and all time limitations, shall be tolled pending the completion of mediation process, except as otherwise provided by law."

7. The parties have discussed the efficacy of mediation and desire that it be ordered by the Commission.

WHEREFORE, Ameren Missouri, with Complainant's consent, respectfully requests that the Commission enter an order authorizing the parties to engage in mediation.

Respectfully submitted,
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d/b/a Ameren Missouri**

CERTIFICATE OF SERVICE

I, Eric Kendall Banks, as counsel for Union Electric Company d/b/a Ameren Missouri, hereby certify that a copy of the foregoing Answer was filed with the Missouri Public Service Commission via EFIS. Copies have also been emailed to the parties of record on this 16th day of April 2021.

/s/ Eric Kendall Banks

Eric Kendall Banks