

**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 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 today, April 21, 2021.

Motion

3. Per 20 CSR 4240-2.070(8), the utility against whom the formal complaint has been filed is allowed, unless otherwise ordered, thirty (30) days after the date of notice to “satisfy the complaint or file an answer.”

4. Per 20 CSR 4240-2.050(3), when an act is required by Commission rule or order to be done within a specified time, the Commission may order the period enlarged before the expiration of the period originally prescribed. The period prescribed in this case will expire at 11:59 p.m. today and therefore has not yet expired.

5. The Company and Complainant are working together to resolve the Complaint to Complainant's satisfaction, but need additional time beyond the 30 days provided by the above Rule to determine if a global settlement can be reached.

6. An additional sixteen (16) days will allow sufficient time for the Company and Complainant to communicate and determine if all of the remaining issues can be resolved.

WHEREFORE, Ameren Missouri, with Complainant's counsel's consent, 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 May 7, 2021.

Respectfully submitted,

/s/ **Jermaine Grubbs**

Jermaine Grubbs, # 68970

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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 21st day of April 2021.

Missouri Public Service Commission

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/s/ *Jermaine Grubbs*