

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri Concerning a Natural Gas) **File No. GS-2016-0159**
Incident at 3404 Georgia Street in)
Louisiana, Missouri)

MOTION TO CONTINUE AMEREN MISSOURI PROGRESS REPORTS

COMES NOW the Staff of the Missouri Public Service Commission, on behalf of itself and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) (the “Parties”¹), and states as follows:

1. On June 28, 2017, the Commission issued an *Order Directing Filing* which noted that Staff’s report on its investigation into the above-captioned incident included various recommendations, and that in Ameren Missouri’s response “Ameren Missouri objects to none [of Staff’s recommendations], but states that compliance with the recommendations related to service line information **will require a year to complete.**” (Emphasis added) The order further stated that “the Commission will direct Staff to coordinate with Ameren Missouri and the Office of the Public Counsel, and file with the Commission, a proposed schedule of progress reports, relating to implementing Staff’s recommendations, to be filed under this file number.” The order further provided that the filing would be due on July 10, 2017.

2. In response to the June 28, 2017 order, the Parties proposed that Ameren Missouri file quarterly progress reports relating to its implementation of Staff’s recommendations beginning on the first business day of October 2017, January 2018, April 2018, and July 2018. On July 19, 2017, the Commission issued an

¹ The undersigned circulated various drafts of this pleading, via email, to the Office of the Public Counsel (“OPC”) but received no feedback from OPC.

Order Scheduling Filings which ordered Ameren Missouri to file progress reports on October 2, 2017; January 2, 2018; April 2, 2018; and July 2, 2018.

3. According to the July 19, 2017 order, Ameren Missouri's last ordered progress report was due on July 2, 2018. On August 28, 2018, the Commission issued an *Order Directing Filing* in which it ordered the Parties to state, no later than September 11, 2018, whether this file can be closed. For the reasons discussed below, this file should not be closed.

4. Compliance with the recommendations related to service line information is taking longer than originally estimated by Ameren Missouri and is still in its early stages. Accordingly, the Parties request the Commission issue an order continuing Ameren Missouri's commitment to file quarterly progress reports relating to its implementation of Staff's recommendations on the first business day of October, January, April, and July until the recommendations are fully implemented or until the Parties mutually agree that the progress reports are no longer needed.

WHEREFORE the Parties request that the Commission issue an order as set forth above.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 10th day of September, 2018.

/s/ Jeffrey A. Keevil