

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

In the Matter of a Working Case to)	
Consider Policies to Improve)	Case No. EW-2016-0313
Electric Utility Regulation)	

MOTION TO LATE FILE

COMES NOW the Midwest Energy Consumers' Group ("MECG") and for its Motion to Late File its Initial Comments in the above-captioned docket, respectfully state as follows:

1. As MECG indicates in its pleading, the comment period in this matter was extremely expedited. Furthermore, the Commission's order establishing this docket provided very little guidance on the issues that the Commission wanted to address.

2. While counsel was preparing to complete these comments in a timely fashion, he was suddenly interrupted by the fact that Ameren and KCPL both filed rate cases on July 1. Given the Commission's tradition of establishing expedited intervention deadlines, counsel was forced to turn his attention to organizing clients for the intervention in the Ameren and KCPL rate cases. As such, these comments are slightly delayed.

3. Counsel believes that the late filing of these comments should not prejudice any of the parties in the preparation of their reply comments. Furthermore, to the extent that any party needs more time to respond to MECG's Initial Comments, MECG will not object to such a short extension.

WHEREFORE, MECG respectfully requests that the Commission grant its motion to late file comments and receive the Initial Comments filed in this matter.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



David L. Woodsmall

Dated: July 11, 2016