

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

Dora Michelle Middleton,	)	
Complainant,	)	
	)	
vs.	)	Case No: EC-2020-0083
	)	
Union Electric Company, d/b/a	)	
Ameren Missouri,	)	
Respondent.	)	

**AMEREN MISSOURI’S MOTION FOR CONTINUANCE**

COMES NOW Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Motion for Continuance states as follows.

1. By its order issued and effective November 18, 2019, the Commission set a pre-hearing conference in this Complaint for November 25<sup>th</sup>, 10 a.m., to be held in Room 305 of the Governor Office Building, 200 Madison Street, Jefferson City, Missouri. The order also provided that any party may participate via telephone, as well.

2. Both attorneys who have entered their appearances on behalf of Ameren Missouri in this Complaint will be unable to participate in the pre-hearing conference, as set, due to previously scheduled matters. On November 25<sup>th</sup>, outside counsel for Ameren Missouri, Ms. Giboney, must travel to and appear at a hearing on a pending motion in Case No. 17CW-CV01008 in Callaway County Circuit Court, set for 11 a.m. Following that hearing, Ms. Giboney must travel to Camden County to attend a previously scheduled two-day meeting for a client. Ameren Missouri’s Corporate Counsel, Ms. Grubbs, is scheduled to participate in the Commission’s November 25<sup>th</sup>, 10 a.m. Winter Gas Supply Meeting.

3. As a result of these conflicts, and in view of the approaching Thanksgiving holiday, Ameren Missouri is seeking a continuance of the pre-hearing conference until on or after Monday, December 2, 2019. Counsel for Ameren Missouri emailed Complainant, and Staff counsel Mr. Pringle, to inquire if they objected to a request by Ameren Missouri to continue the pre-hearing. Mr. Pringle replied and stated that Staff has no objection. Ameren Missouri has not received a response from Complainant.

4. Good cause exists for the Commission to grant a continuance, Ameren Missouri has not previously requested a continuance in this Complaint, and the requested continuance is not intended to unduly delay proceedings in this Complaint.

WHEREFORE, the Company respectfully requests that the pre-hearing conference in this matter be continued until December 2, 2019 or thereafter.

SMITH LEWIS, LLP

/s/ Sarah E. Giboney

Sarah E. Giboney, #50299  
111 South Ninth Street, Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
(573) 443-3141  
(573) 442-6686 (Facsimile)  
[giboney@smithlewis.com](mailto:giboney@smithlewis.com)

/s/ Jermaine Grubbs

Jermaine Grubbs, #68970  
Corporate Counsel  
1901 Chouteau Avenue, MC 1310  
P.O. Box 66149  
St. Louis, MO 63166-6149 (314) 554-3533  
(phone) (314) 554-4014 (facsimile)  
[amerenmoservice@ameren.com](mailto:amerenmoservice@ameren.com)

Attorneys for Union Electric Company d/b/a  
Ameren Missouri

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Continuance was served on the following parties via e-mail this 20<sup>th</sup> day of November, 2019.

Missouri Public Service Commission  
Travis Pringle  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)  
[travis.pringle@psc.mo.gov](mailto:travis.pringle@psc.mo.gov)

Office Of Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Dora Michelle Middleton  
72 Mallard Pointe Drive  
O'Fallon, MO 63368  
[Middletondora42@gmail.com](mailto:Middletondora42@gmail.com)

/s/ Sarah E. Giboney