# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Montgomery & Greaser,	)	
Complainant,	)	
	)	
vs.	)	Case No: GC-2017-0173
	)	
Union Electric Company, d/b/a	)	
Ameren Missouri,	)	
Respondent.	)	

### 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 Setting Procedural Conference dated February 1, 2017, the Commission set a procedural conference in this Complaint for February 14, 2017, at 10 a.m., to be held at the Governor Office Building, 200 Madison Street, Room 305, Jefferson City, Missouri, with attendance also permitted by telephone.
- 2. The Company's outside counsel who regularly represents the Company in such conferences and in the informal off-the-record conferences between the parties that generally follow, and the Company's undersigned senior corporate counsel, both have a conflict on the date set by the Commission, involving the Company's pending electric rate case, ER-2016-0179, that cannot be rescheduled. Said counselors' inability to represent the Company in the previously scheduled matter would work a substantial hardship on the Company.
- 3. Good cause exists for the Commission to grant a continuance, the Company has not previously requested a continuance in this matter, and the requested continuance is not intended to unduly delay proceedings in this Complaint.

WHEREFORE, the Company respectfully requests that the procedural conference in this matter be continued and rescheduled for a date in February 2017 after February 14<sup>th</sup> and before February 27<sup>th</sup>, or, if no such date is available, after the scheduled March 14, 2017 conclusion of the evidentiary hearings in the Company's pending rate case, ER-2016-0179.

### SMITH LEWIS, LLP

### /s/ Sarah E. Giboney

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## /s/ Paula N. Johnson

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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 all the following parties via electronic mail, and additionally on Complainant via regular mail, this  $2^{nd}$  day of February, 2017.

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/s/ Sarah E. Giboney