BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Blodgett Paint Ball &)	
Fun Factory LLC for a Change of)	File No. EO-2021-0163
Electric Supplier to Union Electric Company)	
d/b/a Ameren Missouri from)	
SEMO Electric Cooperative)	

MOTION FOR EXTENSION OF TIME TO FILE REBUTTAL TESTIMONY

COMES NOW the Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), by and through its counsel, and for its *Motion for Extension of Time to File Rebuttal Testimony*, states as follows:

- 1. On December 4, 2020, Blodgett Paint Ball & Fun Factory LLC ("Applicant") filed an application with the Missouri Public Service Commission requesting a change of its electric supplier from SEMO Electric Cooperative ("SEMO") to Union Electric Company d/b/a Ameren Missouri.
- On March 31, 2021, the Commission issued its Order Establishing Procedural Schedule and other Procedural Requirements. Said Order required Ameren Missouri to file its Rebuttal Testimony no later than April 30, 2021.
- 3. On April 9, 2021 Applicant filed its First Amended Application for Change of Electric Supplier.
- 4. Ameren Missouri is in the process of investigating the new allegations contained in said Amended Application.
- 5. 20 CSR 4240-2.050 (3) (A) allows the Commission to "Order the period enlarged before the expiration of the period originally prescribed or as extended by a previous order..."
- 6. Ameren Missouri has notified the parties of its intention to submit this Motion for Extension of Time to File Rebuttal Testimony seeking the Commission's permission

to extend the deadline for filing its Rebuttal Testimony by one week or until May 7, 2021.

- 7. Both Applicant and SEMO have no objection.
- 8. Staff has observed that if the extension is granted the time for filing Surrebuttal Testimony could be extended until May 14, 2021 and the Statement of Facts until May 19, 2021 but all other dates set forth in the Procedural Order could remain the same.
 - 9. Ameren Missouri agrees with Staff's observation.

WHEREFORE, for the aforementioned reasons Ameren Missouri prays that the Commission grant it until Friday, May 7, 2021 to complete and file its Rebuttal Testimony and such other and further relief as the Commission deems just in these circumstances.

Respectfully submitted,

BANKS LAW LLC

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CERTIFICATE OF SERVICE

I, Eric Kendall Banks, as counsel for Union Electric Company d/b/a Ameren Missouri, hereby certify that a copy of the foregoing Motion for Extension of Time to File Rebuttal Testimony 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 29th day of April, 2021.

/s/ Eric Kendall Banks