

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs)
to Increase Its Annual Revenues for)
Electric Service) Case No. ER-2021-0240

**MOTION OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS
TO FILE POST-HEARING BRIEF OUT OF TIME**

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and for its *Motion to File Post-Hearing Brief Out of Time* states as follows:

1. The Commission's *Order Setting Procedural Schedule and Adopting Test Year* in this case established a briefing schedule of December 28, 2021 for Initial Post-Hearing Briefs and January 7, 2022 for Reply Briefs.
2. The MIEC requests that it be permitted to file its Initial Post-Hearing and Reply Briefs out of time in the form of one consolidated brief.
3. Good cause exists for the Commission to grant this motion, as MIEC's delay in filing was caused by severe illness of counsel and counsel's family.

WHEREFORE, the MIEC requests that the Commission grant its Motion for Leave to File Post-Hearing Brief Out of Time.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

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**CERTIFICATE OF
SERVICE**

I do hereby certify that a true and correct copy of the foregoing motion has been emailed to all parties on the Commission's service list in these cases.

/s/ Diana M. Plescia