

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition of Missouri- )  
American Water Company for Approval to ) File No. WO-2022-0176  
Change a Water and Fewer Infrastructure ) File No. SO-2022-0177  
Rate Adjustment (WSIRA) )

**MOTION OF THE MISSOURI INDUSTRIAL ENERGY  
CONSUMERS TO FILE DIRECT TESTIMONY OUT OF TIME**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and for its Motion to File Direct Testimony Out of Time states as follows:

1. Pursuant to the Commission’s Order Establishing Procedural Schedule dated March 9, 2022, the deadline for filing direct testimony was June 2, 2022.
2. Due to an administrative error, the MIEC’s direct testimony in this case was not filed by the June 2 deadline.
3. Good cause exists to grant this motion. The administrative error caused this delay resulted from excusable neglect of counsel. Because this delay is only one (1) day, granting motion will not prejudice the other parties to this case.

WHEREFORE, the Missouri Industrial Energy Consumers respectfully requests that the Commission grant this motion and allow its direct testimony to be filed out of time.

Respectfully submitted,

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

By: /s/ Diana M. Plescia

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Attorney for the Missouri  
Industrial Energy Consumers

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 3<sup>rd</sup> day of June, 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia