

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

Anita Wessling,)	
Complainant,)	
)	
vs.)	Case No: EC-2018-0089
)	
Union Electric Company, d/b/a)	
Ameren Missouri,)	
Respondent.)	

**REQUEST FOR MEDIATION AND MOTION FOR STAY OR EXTENSION OF TIME
TO FILE ANSWER**

COMES NOW Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) and for its Request for Mediation and Motion for Stay or Extension of Time to File Answer states as follows:

1. On September 28, 2017, Anita Wessling (“Complainant”) filed a formal complaint against the Company.
2. On September 28, 2017, the Commission issued its Notice of Contested Case and Order (“Order”), ordering respondent, Ameren Missouri to file an answer no later than October 30, 2017. In its Order, the Commission also offered the parties mediation to resolve the Complaint as an alternative to the formal, evidentiary hearing procedure. When mediation is attempted, 4 CSR 240-2.125(2)(C) provides that “all other actions on the case shall cease and all time limitations shall be tolled pending the completion of the mediation process, except as otherwise provided by law.”
3. The Company believes that the Complaint, generally relating to the reliability of residential electric service provided to Complainant, lends the Complaint to successful resolution via mediation with Complainant, and the Company desires to mediate it.
4. In addition, for good cause, the Commission may enlarge the period when an act is ordered to be done beyond the original period ordered. 4 CSR 240-2.050(3)(A). Good cause exists to grant the Company an extension of the time to answer the Complaint because, in order to fully answer the Complaint (and to prepare for mediation), Company engineering personnel have been assigned to study and evaluate: the frequency and cause of outages in the service area

where Complainant receives residential electric service, along with the configuration of the circuit involved in service to Complainant, to determine the nature of the outages experienced by Complainant and to identify whether improvements to the circuit are indicated. The Company believes it may take until October 30, 2017, or slightly longer, for engineering personnel to complete their studies.

5. As a result, the Company requests a stay to mediate, and in the absence of an agreement by Complainant to mediate, requests an extension of time beyond the current October 30, 2017 deadline to answer the Complaint, in order that it may complete its study.

6. Ameren Missouri has not previously sought an extension in this matter and does not believe that an extension will prejudice any party.

WHEREFORE, Ameren Missouri respectfully requests mediation of the Complaint, and moves the Commission to stay the time to answer the Complaint pending mediation, or to extend the time to answer the Complaint for such period beyond October 30, 2017 as the Commission deems reasonable.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Entry of Appearance was served on the following parties via electronic mail (e-mail) on this 13th day of October, 2017.

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