BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Craig Mershon,	
Complainant,	
vs.	Case No. EC-2013-0521
Union Electric Company d/b/a Ameren Missouri,	
Respondent.)

STAFF REQUEST FOR ADDITIONAL TIME TO FILE REPORT

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), by and through the undersigned counsel, and respectfully states as follows:

- 1. On June 13, 2013, Complainant filed the subject complaint via letter format.
- 2. On June 14, 2013, the Commission issued its *Notice of Contested Case* and *Orders for Small Formal Complaint* ("Notice and Order"). In the Notice and Order, the Commission ordered that the instant complaint will proceed under the Commission's small formal complaint process as set forth in 4 CSR 240-2.070(15).
- 3. The Notice and Order also ordered Respondent to file its answer no later than July 15, 2013, and ordered Staff to investigate the complaint and file a report detailing Staff's findings and recommendations no later than July 29, 2013.
- 4. 4 CSR 240-2.070(15), the Commission's rule governing small formal complaint cases, states in subsection (D) that: "The commission's staff shall, within

forty-five (45) days after the complaint is filed, investigate the complaint and file a report detailing staff's findings and recommendations. The regulatory law judge may allow staff additional time to complete its investigation for good cause shown." (Emphasis added)

5. Due to the shortage of staff in the Staff's Consumer Services Unit combined with the press of other business, including but not limited to other pending reports, Staff respectfully requests that it be allowed additional time to file its report herein; specifically, Staff requests until August 9, 2013, to file its report in this case. Staff does not make this request for any improper purpose, such as to harass or to cause unnecessary delay in the processing of this case, but for the reasons stated above, which Staff believes constitute good cause for granting its request.

WHEREFORE, Staff respectfully prays the Commission issue its order allowing Staff until August 9, 2013, to complete its investigation and file a report detailing Staff's findings and recommendations herein.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties of record this 23rd day of July, 2013.

/s/ Jeffrey A. Keevil