

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

Jerrald Fisher,	)	
	)	
Complainant,	)	<b><u>File No. EC-2017-0281</u></b>
v.	)	
	)	
Union Electric Company d/b/a Ameren Missouri,	)	
	)	
Respondent.	)	

**MOTION FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), and by and through the undersigned counsel, hereby files its *Motion for Extension* as follows:

1. On April 26, 2017 the Complainant, Mr. Jerrald Fisher, filed a Formal Complaint against Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") alleging a wrongful termination of service.
2. On April 27, 2017, the Commission gave notice of a contested case and ordered Ameren Missouri to file an answer, or in the alternative, a request for mediation, no later than May 30, 2017. The Commission also ordered Staff to investigate the complaint and file a report no later than June 27, 2017.
3. On May 30, 2017, Ameren Missouri filed its *Answer, Affirmative Defenses and Motion to Dismiss*.
4. During Staff's investigation, Staff noticed some discrepancies and errors in Ameren Missouri's *Answer*, and contacted an Ameren Missouri representative for clarification. This representative informed Staff that there was a mistake

regarding the total balance in the *Answer*, and that an amended answer would be filed to fix this and to clarify some statements made in the answer. During this exchange, Staff also asked if the Complainant requested service, and if so, for a copy of the denial of service letter and documentation surrounding the Complainant's request for service.

5. On June 21, 2017, Ameren Missouri filed a *Motion for Leave to Amend Its Answer, Affirmative Defenses and Motion to Dismiss*, in which Ameren Missouri asked for leave to correct typographical errors and "inartfully plead" allegations regarding the Company's position on disputed issues by filing an amended answer. The Commission granted this *Motion* on the same date.
6. Staff has also been informed that Ameren Missouri may need additional time to provide documentation relating to the Complainant's request for service and the denial letter, if the Complainant made such a request.
7. As Staff does not know when Ameren Missouri will file its amended answer, and what additional investigation Staff may need to undertake due to changes from the initial *Answer*, and since Staff is still in the process of receiving documentation from Ameren Missouri, Staff does not anticipate completing its investigation before the June 27, 2017 deadline. Staff therefore requests an extension of time, to allow for time to review Ameren Missouri's amended answer when filed, as well as review the documentation, once received.

**WHEREFORE**, Staff prays that the Commission grants this *Motion for Extension*, granting Staff an additional 30 days to complete its report by July 21, 2017 and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

**/s/ Nicole Mers**

Nicole Mers

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 22<sup>nd</sup> day of June 2017, to all counsel of record.

**/s/ Nicole Mers**