

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

Keelee Swopshire,)	
)	
Complainant,)	
)	
v.)	<u>File No. EC-2022-0148</u>
)	
Union Electric Company d/b/a Ameren Missouri,)	
)	
Respondent)	

SECOND MOTION FOR EXTENSION

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

1. On December 2, 2021, Keelee Swopshire (“Complainant”) filed a small formal Complaint against Union Electric Company d/b/a Ameren Missouri (“Respondent” or “Company”).
2. The Commission ordered Staff to investigate and file a report detailing its findings and recommendations no later than January 17, 2022.
3. On January 10, 2022, Staff requested an extension until February 16, 2022, in order to complete its investigation. On January 11, 2022, the Commission granted Staff’s request.
4. While Staff’s investigation has collected material exhibits in response to its Data Requests (DRs), Staff has determined a field investigation is requisite under the particular circumstances of this case. Respondent has agreed to facilitate the investigation and the field visit is scheduled for the second week in February. To account

for the additional discovery, Staff requests the Commission grant Staff a further extension, up to and including April 1, 2022, to conduct the field visit and to finalize its Recommendation. Staff Counsel has communicated with both Complainant and counsel for Respondent regarding the cause for an additional extension, and they have both indicated no opposition to Staff's request.

WHEREFORE, Staff requests the Commission grant it an extension, up to and including, April 1, 2022, to file its recommendation; and grant such other and further relief as is reasonable in the circumstances.

Respectfully submitted,

/s/ Don Cosp

Don Cosp

Legal Counsel

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Missouri Public Service Commission

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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 14th day of February, 2022, to all counsel of record.

/s/ Don Cosp