

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

Vas Construction, LLC,	)	<u>File No. EC-2021-0295</u>
	)	<u>File No. EC-2021-0296</u>
Complainant,	)	<u>File No. EC-2021-0297</u>
	)	<u>File No. EC-2021-0298</u>
v.	)	<u>File No. EC-2021-0299</u>
	)	<u>File No. EC-2021-0300</u>
Union Electric Company d/b/a Ameren	)	<u>File No. EC-2021-0301</u>
Missouri,	)	<u>File No. EC-2021-0302</u>
Respondent	)	<u>File No. EC-2021-0303</u>

**MOTION TO CONSOLIDATE AND CLARIFICATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Motion to Consolidate and Clarification* respectfully states:

**I. MOTION TO CONSOLIDATE**

1. On March 19, 2021, Vas Construction, LLC (“Vas”) filed nine (9) formal complaints against Union Electric Company d/b/a Ameren Missouri (“Ameren”) in the above captioned dockets.

2. In the interests of administrative efficiency and the economy of resources, the Staff respectfully requests the Commission consolidate these nine (9) cases for all purposes.

3. Consolidation is further supported due to the following related questions of fact, per Commission Rule 20 CSR 4240-2.110(3):

**RELATED QUESTIONS OF FACT**

4. All nine (9) complaints arise from service provided by Ameren to Vas.

5. All nine (9) complaints are against Ameren for service provided to Vas.

6. All nine (9) complaints arise from the same corporate guaranty executed between Ameren and Vas on April 18, 2017.

7. All nine (9) complaints arise from the claim by Vas that the corporate guaranty executed on April 18, 2017 did not have an expiration date.

8. Staff Counsel has reached out to counsel for both Vas and Ameren, and neither party objects to consolidation.

## **II. MOTION FOR CLARIFICATION**

9. On March 22, 2021, the Commission its *Order Giving Notice and Directing Response to Complaint* in all nine (9) files.

10. In File Nos. EC-2021-0295 and EC-2021-0299-0303, the Commission order Staff to investigate the complaint and file its report no later than May 3, 2021.<sup>1</sup>

11. However, in EC-2021-0296 through EC-2021-0298, the Commission does not order Staff to investigate the complaint and file a report.

12. Staff respectfully requests clarification from the Commission as to whether the complaints in File Nos. EC-2021-0296-0298 are to be investigated or not.

**WHEREFORE**, Staff prays that the Commission will consolidate these nine (9) cases for all purposes, clarify the need for staff investigations in File Nos. EC-2021-0296-0298, and grant such other and further relief as the Commission considers just in the circumstances.

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<sup>1</sup> *Order Giving Notice and Directing Response to Complaint*, pg. 3, para. 4.

Respectfully submitted,

**/s/ Travis J. Pringle**

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Attorney for Staff of the  
Missouri Public Service Commission

**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 5<sup>th</sup> day of April 2021, to all parties and/or counsels of record.

**/s/ Travis J. Pringle**