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

Keelee Swopshire,	)
Complainant,	) )
v.	) )
Union Electric Company d/b/a Ameren Missouri,	) )
Respondent,	) )

## **REQUEST FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and for its request for extension respectfully states:

- 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. Staff has submitted a series of Data Requests (DRs) to Respondent over the course of its investigation. Staff is awaiting a response from Respondent regarding the history of Complainant's meter, as well as additional information pertinent to Staff's investigation of the complaint.
- 4. Staff has requested further clarification from Complainant regarding facts in the complaint. Staff is awaiting a response from Complainant.
  - 5. Respondent has until January 9, 2022 to respond to Staff's DRs.
- 6. Due to the impact these responses may have on Staff's report, Staff is requesting a thirty-day extension. The new filing date would be February 16, 2022.

- 7. Commission Rule 20 CSR 4240-2.070(15)(D) states, "The regulatory law judge may allow staff additional time to complete its investigation for good cause shown."
- 8. Due to the impact both responses may have on Staff's report, the requisite good cause exists for an extension.

WHEREFORE, Staff respectfully requests that the Commission grant its Request for Extension, and any other relief the Commission deems just and proper under the circumstances.

Respectfully submitted,

## /s/ Don Cosper

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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 10th day of January, 2022, to all counsel of record.

/s/ Don Cosper